

DAVID DELL’AQUILA, LORANND  
BORJA, TODD CHESNEY, and BRENT  
WEBER, on behalf of themselves and all  
others similarly situated,  
*Plaintiffs*  
v.  
NATIONAL RIFLE ASSOCIATION OF  
AMERICA  
*Defendant.*

NOW COMES Plaintiffs, by their attorneys LOEVY & LOEVY, and respectfully move for Leave to File a Certain Exhibit Under Seal. In support, Plaintiff states as follows:

2. These paragraphs have been redacted because they quote documents that Defendant National Rifle Association (“NRA”) disclosed during discovery and designated as CONFIDENTIAL under the protective order the Parties have negotiated. Therefore, Plaintiff seeks leave to file a non-redacted version of the proposed Third Amended Complaint under seal.

Case 3:19-cv-00679 Document 133 Filed 06/30/23 Page 1 of 3 PageID #: 1503

4. Pursuant to the protective order, Plaintiff reserves the right to challenge NRA's designation of these documents as confidential, but the Parties have not engaged in a meet and confer regarding that issue at the time of this filing.

WHEREFORE, Plaintiffs respectfully request leave to file an unredacted exhibit to the Motion for Leave To File Third Amended Complaint under seal.

DATED: June 30, 2023

Respectfully submitted,

s/ Julia Rickert  
*One of Plaintiffs' Attorneys*

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*Counsel for Plaintiffs*

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2023, a true and exact copy of Plaintiffs' Motion to Seal was electronically filed with the Clerk's Office using the the CM/ECF filing system and served via the Court's CM/ECF system and/or via email and/or U.S. Mail upon the parties listed below. Parties may also access this filing through the Court's CM/ECF system.

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Respectfully submitted,  
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